

EXHIBIT F

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

YOUNG AMERICA'S FOUNDATION;
BINGHAMTON UNIVERSITY
COLLEGE REPUBLICANS; and **JON**
LIZAK, President of the College
Republicans of Binghamton University,

Plaintiffs,

v.

HARVEY STENGER, President of
SUNY-Binghamton, in his official and
individual capacities; **BRIAN ROSE**, Vice
President for Student Affairs of SUNY-
Binghamton, in his official and individual
capacities; **JOHN PELLETIER**, Chief of
SUNY-Binghamton UPD, in his official
and individual capacities; **COLLEGE**
PROGRESSIVES, a student
organization at SUNY-Binghamton;
PROGRESSIVE LEADERS OF
TOMORROW ("PLOT"); **STUDENT**
ASSOCIATION OF BINGHAMTON
UNIVERSITY,

Defendants.

Civil Action No. 3:20-cv-822 (LEK/ML)

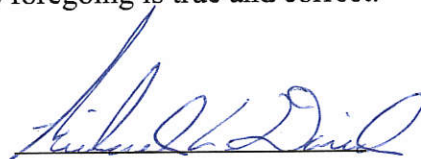
Declaration of Richard C. David

I, Richard C. David, do hereby declare under penalty of perjury that:

1. I am the Mayor of Binghamton, New York, and have served in that position since January 2014. I have lived and worked in the Binghamton community since 1999.
2. I am familiar with the activities of an organization that calls itself Progressive Leaders of Tomorrow ("PLOT"). PLOT has intentionally engaged in conduct designed to influence local politics through force and other methods, including attempting to shut down a city parade.
3. Masai Andrews is known to me and in the local Binghamton community as a leader of PLOT.

4. In October 2019, Mr. Andrews was arrested in Binghamton for leading a PLOT group that illegally disrupted a city parade. Mr. Andrews stood in the middle of the parade route while shouting his message through a megaphone. At one point, he led other protesters in a chant of "No justice, no peace."
5. On about November 7, 2019, I attended a public PLOT meeting at the Broome County Public Library. Mr. Andrews walked up to the microphone to address the seated audience and informed them that the meeting would begin shortly. However, Mr. Andrews told the audience that I was seated in the back and would not be welcome to stay. It was evident from this interaction that Mr. Andrews was one of the people leading the PLOT meeting that night.
6. I have also witnessed Mr. Andrews leading PLOT protests outside of City Hall, where I work, on multiple occasions.
7. It is well-known to me and in the Binghamton community that Masai Andrews operates on social media under the pseudonym Roderick Douglass.
8. Under this pseudonym, Masai Andrews is active on PLOT's Facebook page (<https://www.facebook.com/BingPLOT>), and, on his own Facebook page (<https://www.facebook.com/roderick.douglass.188>), has published messages on PLOT's behalf.
9. I declare under penalty of perjury that the foregoing is true and correct.

Dated: Binghamton, NY
December 30, 2020



Richard C. David
Mayor of Binghamton, New York